

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**JOSEPH THOMAS, et al,**

**Plaintiffs**

**vs.**

**Civil Action No. 3:18cv441-CWR-FKB**

**PHIL BRYANT, Governor of  
Mississippi, et al.,**

**Defendants.**

**PLAINTIFFS' RESPONSE IN OPPOSITION  
TO THE DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

The Defendants' Motion for Summary Judgment [Doc. 19] should be denied. As set forth more fully in the Plaintiffs' contemporaneous Memorandum in Opposition to the Defendants' Motion for summary judgment, this case is not barred by limitations or laches and the proper defendants have been named in this case. In addition to that memorandum, the Plaintiffs submit the attached declaration of William S. Cooper.

September 18, 2018

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 18, 2018 I electronically filed a copy of the foregoing Plaintiffs' Response in Opposition to the Defendant's Motion for Summary Judgment using the ECF system which sent notification of such filing to all counsel of record.

s/Robert B. McDuff